

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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March 21, 2023

BY ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: United States v. Pierre Girgis
22 Cr. 006 (KPF)**

Dear Judge Failla:

We write to request an adjournment of the deadline to file a motion to compel discovery in the above-captioned case. The Government does not object to this request. Currently, the defense motion is due March 31, 2023; the Government's response is due June 16, 2023; and the defense reply is due July 14, 2023. A status conference is scheduled for August 30, 2023.

We sent discovery requests to the Government on October 20, 2022, and February 6, 2023. On March 2, 2023, the Government responded; it provided some additional discovery and requested further information about two of the requests. We have been actively discussing the outstanding discovery requests with the Government, and seek a 28-day extension to resolve any remaining issues before filing a motion to compel.

We have conferred with the Government and propose a 28-day adjournment, resulting in the following schedule:

- Defense Motion to Compel: due April 28, 2023
- Government Response: due July 14, 2023
- Defense Reply: due August 11, 2023

Respectfully Submitted,

/s/
Andrew J. Dalack
Hannah McCrea
Michael Arthus
Assistant Federal Defenders
(646) 574-0351

cc (by ECF): AUSAs Kyle Wirshba and Elinor Tarlow

Application GRANTED. The Clerk of Court is directed to terminate the motion at docket entry 33.

Dated: March 21, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE